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Attorneys for Defendants
5 Robert Gomez, Gomez & Associates, Inc.
and Rock'n Rob Enterprises
6

7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,)

10 Plaintiff,)

11 vs.)

12 PCPLV LLC d/b/a Pinnacle.
Compounding Pharmacy, Ofir Ventura,
13 Cecilia Ventura, Brandon Jimenez, Robert
Gomez, Gomez & Associates, Inc., Rock'n
14 Rob Enterprises, Amir Shalev, D.P.M., AS
Enterprises, Inc., and Ivan Lee Goldsmith,
15 M.D.)

16 Defendants.)

Case no.: 2:21-cv-00184

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO
RESPOND TO COMPLAINT**

(Second Request)

17 **STIPULATION AND ~~[PROPOSED]~~ ORDER TO**
18 **EXTEND TIME TO RESPOND TO COMPLAINT**

19 Plaintiff, the United States of America, and Defendants Robert Gomez, Gomez &
20 Associates, Inc., and Rock'n Rob Enterprises ("Defendants") stipulate to extend the time by
21 which Defendants may respond to the Complaint in this action by 14 days from February 27,
22 2024 to March 12, 2024, and in support thereof, say:

- 23 1. Plaintiff filed their Complaint in this action on February 2, 2021.
24 2. Defendant, Robert Gomez was served with the Complaint in this on or about
25 January 23, 2024.
26 3. There is good cause to extend the time by which Defendants may respond to the
27 Complaint in this action because counsel for Defendants are hoping for a resolution.
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1 4. Based upon Defendants' request, the Parties have agreed to extend the deadline by
2 which Defendants may respond to the Complaint by 14 days from February 27, 2024 to March
3 12, 2024, subject to the Court's approval.

4 5. Defendants have not previously requested an extension of the deadline to respond
5 to the Complaint.

6 **IT IS SO STIPULATED**

7 Dated this 26th day of February, 2024.

 Dated this 26th day of February, 2024.

8 Jason M. Frierson
9 United States Attorney

 David T. Brown
 Brown, Brown & Premsrut

10 /s/ Christian Ruiz

 /s/ David T. Brown

11 _____
12 CHRISTIAN RUIZ
13 Assistant U.S. Attorney
 Counsel for United States of America

 DAVID T. BROWN
 Counsel for Defendants

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15 IT IS SO ORDERED

16 
17 UNITED STATES MAGISTRATE JUDGE

18 Dated: 2/28/2024
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on February 26, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/EMF. I also certify that a true and correct copy of the foregoing document is being served via transmission of Notices of Electronic Filing generated by CM/EMF.

/s/ Alexis Budner

ALEXIS BUDNER